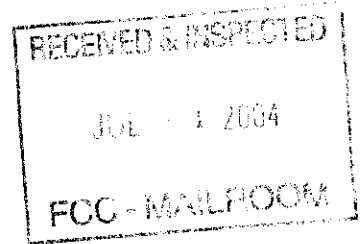




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3615 North Broadway
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Minot, ND 58702-2027
701-858-1200

SRT Connections
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701-858-1200

June 23, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of 1996,
CC Docket 96-128

Dear Ms. Dortch:

SRT Communications Inc. ("SRT"), providing interexchange telecommunications services under the name of SRT Long Distance, submits this letter and accompanying certification as record that SRT is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003, respecting the obligations of Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As SRT is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, SRT is not subject to such requirements at this time. If SRT operations are altered to the extent that SRT necessarily becomes a Completing Carrier, SRT intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

John Reiser
Chief Operations Officer
SRT Communications Inc

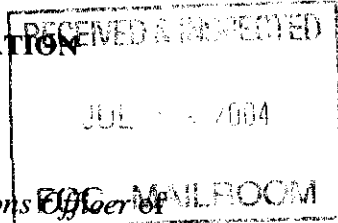
cc: Ms. Ruth Jaeger
President
APCC Services, Inc.
625 Slater Lane, Suite 104
Alexandria, Virginia 22314

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¹ The Pay Telephone Reclassification and Compensation Provisions of the
Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).



**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF SRT COMMUNICATIONS INC**



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1. My name is John Reiser. I currently serve as the *Chief Operations Officer* of SRT Communications Inc, (SRT) a provider of interstate interexchange telecommunications services under the name of SRT Long Distance, as a toll reseller in the state of North Dakota. In this capacity, I have become familiar with the network operations of SRT and its practices associated with the completion of calls originated from Pay Telephones.

2. SRT is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.

3. With respect to coinless access code calls, SRT is a switchless reseller. SRT contracts with Global Crossing for completion of calls originated by access code.

4. With respect to subscriber toll-free payphone calls, SRT is a switchless reseller. SRT contracts with Global Crossing for completion subscriber toll-free calls.

5. SRT does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.

6. SRT does not create call detail records for either access code calls or subscriber toll-free payphone calls. SRT Communications Inc action with respect to call detail records is limited to rating and billing.

7. SRT compensates Global Crossing for the wholesale cost of the call.

8. SRT has confirmed with Global Crossing that any calls purchased by SRT are included in the respective call tracking systems and compensation remittance process of Global Crossing.

9. In consideration of the aforementioned facts, SRT is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 23, 2004.

John Reiser
Chief Operations Officer
SRT Communications Inc
PO Box 2027
Minot, ND 58702-2027

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*